

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,
Plaintiff,

v

D-3 JATEESHA TAYLOR
Defendant.

Case No: 15-CR-20007
Honorable Laurie J. Michaelson
Magistrate David R. Grand

**DEFENDANT'S MOTION FOR APPOINTED COUNSEL FOR DEFENDANT NUMBER
3 TO WITHDRAW AND FOR THE APPOINTMENT OF NEW COUNSEL**

Now comes, Defendant Jateesha Taylor's court appointed counsel, Lisa B.

Kirsch Satawa and for her Motion states the following:

1. Counsel was appointed to represent Ms. Taylor pursuant the CJA on or about February 18, 2015.
2. Ms. Taylor is charged with two counts of providing a weapon to a prohibited person.
3. Over the past two years counsel has diligently represented Ms. Taylor, including but not limited to multiple meetings with client, negotiations and multiple meetings with the government, preparation for trial, thorough discovery, review and investigation of the pending charges and creating and implementing a strategy to best protect Ms. Taylor's rights and accomplish her goals.

4. Over the years, Ms. Taylor has met with counsel and requested copies of her discovery to review on her own time as she works two jobs and has five children making her time limited.
5. Counsel has always corresponded with client in writing in addition to phone contact to make sure she was apprised.
6. The Government has extended numerous plea offers to Ms. Taylor that have been communicated to her in detail and she declined.
7. Over the past six weeks counsel has diligently prepared for trial. She has taken steps to insure Ms. Taylor's rights were protected and all of the assistance needed is available. Counsel has begged Ms. Taylor to gather certain documents and to meet with her to further the strategy.
8. The parties and counsel appeared before this Honorable Court in February. At that time, Ms. Taylor requested new counsel. It was agreed that counsel and Ms. Taylor could work together and if there was an issue it could be brought to the Court's attention.
9. Ms. Taylor acknowledged and agreed that she would meet with counsel on February 27th and 28th. Ms. Taylor did not attend these meetings. A preparation meeting was scheduled on March 1st and she likewise failed to attend.
10. On or about February 24, 2017, counsel confirmed the above meeting dates and requested information and documents from Ms. Taylor. No documents have been received.

11. Yesterday, Ms. Taylor called counsel requesting a meeting but also needing more time to gather documents and review discovery.
12. Counsel has repeatedly set meeting and requested Ms. Taylor to provide her with certain information that was never received.
13. Ms. Taylor has impeded this attorney's ability to represent her effectively.
14. At this time there is a breakdown in the attorney client relationship to the extent that it is impossible to effectively communicate, protect her rights and defend the allegations.
15. This matter is set for trial on May 22, 2017 so appointing new counsel will not be prejudicial to Ms. Taylor or the Government.

Wherefore, Defense Counsel respectfully requests this Honorable Court allow her to withdraw and new counsel be appointed forthwith to represent Ms. Taylor.

Respectfully Submitted,

Dated: March 14, 2017

/S/ Lisa B. Kirsch Satawa
Lisa B. Kirsch Satawa P52675
Attorney for Defendant Jateesha Taylor

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2017, I electronically filed the forgoing document, a Notice of Hearing and this Certificate of Service with the Clerk of the Court using ECF system which will send the notification of such filing to all parties on record and placed a copy in an envelope with proper postage affixed and served Ms. Taylor at 3211 Calvert, Detroit, Michigan 48206.

/s/ Lisa Kirsch Satawa
Lisa Kirsch Satawa P52675